

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES  
PRACTICES, AND PRODUCTS  
LIABILITY LITIGATION**

**MDL NO. 16-2738 (MAS) (RLS)**

***THIS DOCUMENT RELATES TO ALL CASES***

**CERTIFICATION OF MICHELLE A. PARFITT, ESQ.**

Michelle A. Parfitt, Esq. hereby certifies as follows:

1. I am an attorney at law and senior partner at the law firm of Ashcraft & Gerel. I was appointed as Plaintiffs' Co-Lead Counsel to represent all Plaintiffs in the above-captioned matter.

2. I submit this Certification based on personal knowledge in support of the Plaintiffs' Steering Committee's Memorandum of Law in Opposition to Defendants Johnson & Johnson and LLT Management LLC's Motion to Exclude the Opinions of Drs. David Kessler, Laura Plunkett, William Sage, and George E. Newman.

3. Attached hereto as Exhibit 1 is a true and correct copy of the Amended Expert Report of David Kessler, M.D., dated November 15, 2023.

4. Attached hereto as Exhibit 2 is a true and correct copy of the Deposition of David Kessler, M.D., dated April 8, 2024.

5. Attached hereto as Exhibit 3 is a true and correct copy of the 3<sup>rd</sup> Amended Expert Report of Laura Plunkett, Ph.D., DABT, dated May 28, 2024.
6. Attached hereto as Exhibit 4 is a true and correct copy of the Deposition of Laura Plunkett, Ph.D., DABT, dated December 21, 2023.
7. Attached hereto as Exhibit 5 is a true and correct copy of the Amended Expert Report of William Sage, MD, JD, dated November 15, 2023.
8. Attached hereto as Exhibit 6 is a true and correct copy of the Deposition of William Sage, MD, JD, dated September 23, 2021.
9. Attached hereto as Exhibit 7 is a true and correct copy of the Report of George Newman, Ph.D., dated November 15, 2023.
10. Attached hereto as Exhibit 8 is a true and correct copy of the Deposition of George Newman, Ph.D., dated May 15, 2024.
11. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

Dated: August 22, 2024

s/ Michelle A. Parfitt  
Michelle A. Parfitt